**Remarks**

## I. Administrative Overview

Claims 1-6, 8-18 and 20-26 were previously presented. Claims 1-6, 8-18 and 20-26 are rejected under 35 U.S.C. § 103. Applicants respectfully traverse these rejections and submit that Claims 1-6, 8-18 and 20-26 as previously presented are patentable and in a condition for allowance. Accordingly, Applicants respectfully request withdrawal of all rejections and allowance of the pending claims.

## II. Rejections under 35 U.S.C. § 103

Claims 1-6, 8-18 and 20-26 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent Number 6,304,637 to Mirashrafi et al. ("Mirashrafi") in view of U.S. Patent Number 6,484,206 to Crump et al. ("Crump") in view of U.S. Patent Number 7,010,300 to Jones et al. ("Jones") and in further view of U.S. Patent Number 6,065,120 to Laursen et al. ("Laursen"). Applicants respectfully submit that Claims 1-6, 8-18 and 20-26 as previously presented are patentable over any combination of Mirashrafi, Crump, Jones and Laursen.

A demonstration of *prima facie* obviousness requires a showing that the cited references, either together or alone, teach or suggest each and every element of the claimed invention. Applicants respectfully submit that neither Mirashrafi, Crump, Jones nor Laursen teaches or suggests each and every element of the claimed invention because none of these references teaches or suggests <u>linking after a ticket is validated,</u> a re-established first connection to a maintained second connection between a first protocol service and a host service as required by independent Claims 1 and 13.

The Examiner admits that Crump does not teach or suggest linking after a ticket is validated, the re-established first connection to the maintained second connection. *See* Office Action mailed March 4, 2009, page 3.

As stated in the Applicants previous response filed on June 4, 2009 and reiterated here with emphasis, Laursen also does not teach or suggest linking after a ticket is validated, the re-established first connection to the maintained second connection. Rather, Laursen describes a system for self-provisioning through a first device to ensure secure access to managed

U.S.S.N.: 10/711,646                     Page 2 of 4                  Atty. Docket No.: 2006579-0440
                                                                          Client Ref. No. CTX-087

4476002v1

information and does not teach or even suggest re-establishing a first connection while maintaining a second connection. *See* Laursen, col. 1, lines 24-30.

Jones also does not teach or suggest linking a re-established first connection with a second connection, because as stated in the Applicants previous response filed on June 4, 2009 and reiterated here with emphasis, Jones does not teach a disrupted connection and therefore cannot teach or suggest a re-established connection because the connection is never disrupted.

Like Crump, Laursen and Jones, Mirashrafi also does not teach or suggest linking after a ticket is validated, a re-established first connection to a maintained second connection between a first protocol service and a host service. The system in Mirashrafi establishes a direct connection between a client and a server (i.e. the changeover bridgeport) when a user indicates that the user would like to directly connect to the server. *See* Mirashrafi, col. 11, lines 5-13 and 47-53. This direct connection is established while a connection between the server and a telephone network is maintained. Mirashrafi does not teach or suggest that the direct connection should be linked to the connection between the server and the PSTN after a ticket is validated. At no point does Mirashrafi even discuss validating a ticket associated with a client or authenticating a user or client. It would not be obvious to link the connections together after validation of a ticket because at no point does Mirashrafi describe or require authentication. Thus, Mirashrafi does not teach or suggest each and every element of the claimed invention.

What is more, one would not be motivated to combine Mirashrafi with Laursen because doing so would render Laursen inoperable for its intended purpose. Laursen describes a system that provides secure access to managed information by authenticating a wireless device to a server. If Laursen were to maintain a second connection after the disruption of a first connection, a security hole could be created whereby un-authenticated devices or users could the secure information. Therefore, one would not be motivated to combine Mirashrafi with Laursen.

Claims 1 and 13 are patentable over any combination of Mirashrafi, Crump, Jones and Laursen because no combination of these references will teach or suggest each and every element of the claimed invention. Claims 2-6, 8-12, 14-18 and 20-26 are also patentable over Mirashrafi in view of Crump in view of Jones and in further view of Laursen because Claims 2-6, 8-12, 14-18 and 20-26 depend on and incorporate the limitations of Claims 1 and 13. Accordingly Applicants respectfully request that the Examiner withdraw this rejection.

## III. Conclusion

Applicants contend that each of the Examiner's rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application; the Examiner is urged to contact the Applicants' agent at the telephone number identified below.

<div style="text-align: right;">

Respectfully submitted,
CHOATE, HALL & STEWART LLP

</div>

Date: October 6, 2009

/Kellan D. Ponikiewicz/
Kellan D. Ponikiewicz
Registration Number: 59,701

Patent Group
CHOATE, HALL & STEWART LLP
Two International Place
Boston, MA 02110
Phone: (617) 248-5000
Fax: (617) 502-5002